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Attorneys for Plaintiff
DAVID S. SAVAGE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DAVID S. SAVAGE,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

No. CIV.S-04-2316 WBS KJM

**STIPULATION TO TAKE
DEPOSITION TESTIMONY
BEYOND THE DISCOVERY
DEADLINE AND
[PROPOSED] ORDER**

UNITED STATES OF AMERICA,

Counterclaim Plaintiff,

v.

DAVID S. SAVAGE and PHYLISS SAVAGE,

Counterclaim Defendants.

Pursuant to Federal Rule of Civil Procedure 29, all the parties to this action hereby stipulate that deposition testimony may be taken up to and including November 14, 2005 at days and times mutually convenient to the parties. The parties agree this modest extension of the discovery deadline does not interfere in any way with the conduct of this proceeding or the resolution of any matter now

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1 pending before the Court.

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3 DATED: October 5, 2005

4 McDONOUGH HOLLAND & ALLEN PC
5 Attorneys at Law

6
7 By: /s/ Robert R. Rubin
8 Robert R. Rubin
9 Attorneys for Plaintiff David S. Savage

10 DATED: October 5, 2005

11 McGREGOR W. SCOTT
12 United States Attorney

13 By: /s/ Richard A. Latterell
14 Richard A. Latterell
15 U.S. Department of Justice
16 Attorneys for the United States of America

17 DATED: September 29, 2005

18 /s/ Phyliss Savage
19 Phyliss Savage, In Pro Per

20
21 **ORDER**

22 IT IS SO ORDERED.

23 DATED: October 7, 2005

24 
25 WILLIAM B. SHUBB
26 UNITED STATES DISTRICT JUDGE